

EXHIBIT E

CONFIDENTIAL

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, a Delaware Limited Liability Company, JUSTIN BALDONI, an individual, JAMEY HEATH, an individual, STEVE SAROWITZ, an individual, IT ENDS WITH US MOVIE LLC, a California Limited Liability Company, MELISSA NATHAN, an individual, THE AGENCY GROUP PR LLC, a Delaware Limited Liability Company, JENNIFER ABEL, an individual,

Defendants.

Civ. Action No. 1:24-cv-10049-LJL
(Consolidated for pretrial purposes with
1:25-cv-00449-LJL)
rel. 1:25-cv-00779-LJL

**DEFENDANTS/CONSOLIDATED
PLAINTIFFS' INITIAL
DISCLOSURES**

WAYFARER STUDIOS LLC, a Delaware Limited Liability Company, JUSTIN BALDONI, an individual, JAMEY HEATH, an individual, IT ENDS WITH US MOVIE LLC, a California Limited Liability Company, MELISSA NATHAN, an individual, JENNIFER ABEL, an individual, and STEVE SAROWITZ, an individual,

Plaintiffs,

v.

BLAKE LIVELY, an individual, RYAN REYNOLDS, an individual, LESLIE SLOANE, an individual, VISION PR, INC., a New York corporation, and THE NEW YORK TIMES COMPANY, a New York corporation,

Defendants.

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DEFENDANTS/CONSOLIDATED PLAINTIFFS' INITIAL DISCLOSURES¹

Defendants/Consolidated Plaintiffs Wayfarer Studios LLC (“Wayfarer”), Justin Baldoni (“Baldoni”), Jamey Heath (“Heath”), Steve Sarowitz (“Sarowitz”), It Ends With Us Movie LLC (“IEWUM”), Melissa Nathan (“Nathan”), Jennifer Abel (“Abel”), and Defendant The Agency Group PR LLC (“TAG”) (all collectively the “Wayfarer Parties”) hereby make the following initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure (the “Initial Disclosures”) in connection with *Blake Lively v. Wayfarer Studios LLC et al.*, Case No. 1:24-cv-10049-LJL; consolidated case *Wayfarer Studios LLC et al. v. Blake Lively et al.*, Case No. 1:25-cv-00499-LJL; and related case *Stephanie Jones et al. v. Jennifer Abel et al.*, Case No. 1:25-cv-00779-LJL.

The Wayfarer Parties make these Initial Disclosures based upon information obtained and available to date. By making these disclosures, the Wayfarer Parties do not represent that they are identifying, describing, and/or producing or identifying every document, item of electronically stored information, tangible thing or witness, damages, or insurance policy that the Wayfarer Parties may use in support of their claims. In addition, it is possible that an individual listed herein may not, in fact, personally possess significant or relevant information regarding the issues involved in this litigation or may only have limited knowledge or knowledge which is duplicative of knowledge possessed by others. The Wayfarer Parties reserve the right to modify, amend, or otherwise supplement these Initial Disclosures in accordance with Rule 26(e) as additional information becomes available. As such, the Initial Disclosures represent a good faith effort to identify information currently available and that the Wayfarer Parties reasonably believe is

¹ The parties are presently engaged in discussions regarding the submission of a proposed protective order for the Court’s review and approval. Pending entry of such a protective order, the Wayfarer Parties hereby designate the entirety of these Initial Disclosures as confidential pursuant to any protective order ultimately entered by the Court.

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required by Rule 26(a)(1).

The Wayfarer Parties make these disclosures subject to, and without waiving, but on the contrary expressly reserving, any attorney-client or work product privileges or any other applicable privileges or immunities. The Wayfarer Parties make these disclosures subject to, and without waiving, but on the contrary expressly reserving, their right to assert objections on the grounds of competency, relevancy, hearsay, materiality, undue burden, or any other proper ground, whether during discovery or trial.

(i) Name, address, and phone number of individuals likely to have discoverable information:

Based upon the Wayfarer Parties' investigation thus far, the Wayfarer Parties are presently aware of and believe that the following individuals are likely to have discoverable information that the Wayfarer Parties may use to support their claims and defenses.

Individuals	Subject of Information
Justin Baldoni c/o Bryan J. Freedman, Esq. Liner Freedman Taitelman + Cooley, LLP 1801 Century Park West, 5th Floor Los Angeles, CA 90067 310-201-0005	Baldoni is a party and co-founder of Wayfarer Studios. He has percipient knowledge as to facts and events alleged in the pleadings, including his and Wayfarer's damages.
Person most knowledgeable of Wayfarer Studios LLC c/o Bryan J. Freedman, Esq. Liner Freedman Taitelman + Cooley, LLP 1801 Century Park West, 5th Floor Los Angeles, CA 90067 310-201-0005	Wayfarer Studios LLC is a party and thus has knowledge as to facts and events alleged in the pleadings, including its damages.
Person most knowledgeable of It Ends With Us Movie LLC c/o Bryan J. Freedman, Esq. Liner Freedman Taitelman + Cooley, LLP 1801 Century Park West, 5th Floor Los Angeles, CA 90067 310-201-0005	It Ends With Us Movie LLC is a party and thus has knowledge as to facts and events alleged in the pleadings, including its damages.

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Jamey Heath c/o Bryan J. Freedman, Esq. Liner Freedman Taitelman + Cooley, LLP 1801 Century Park West, 5th Floor Los Angeles, CA 90067 310-201-0005	Heath is a party and CEO of Wayfarer Studios. He has percipient knowledge as to facts and events alleged in the pleadings, including his and Wayfarer's damages.
Shekinah Reese c/o Bryan J. Freedman, Esq. Liner Freedman Taitelman + Cooley, LLP 1801 Century Park West, 5th Floor Los Angeles, CA 90067 310-201-0005	Reese is an assistant to Mr. Heath. She has percipient knowledge as to facts and events alleged in the pleadings.
Person most knowledgeable of The Agency Group PR, LLC c/o Bryan J. Freedman, Esq. Liner Freedman Taitelman + Cooley, LLP 1801 Century Park West, 5th Floor Los Angeles, CA 90067 310-201-0005	The Agency Group PR, LLC is a party and thus has knowledge as to facts and events alleged in the pleadings.
Steve Sarowitz c/o Bryan J. Freedman, Esq. Liner Freedman Taitelman + Cooley, LLP 1801 Century Park West, 5th Floor Los Angeles, CA 90067 310-201-0005	Sarowitz is a party. He has percipient knowledge as to facts and events alleged in the pleadings, including his and Wayfarer's damages.
Melissa Nathan c/o Bryan J. Freedman, Esq. Liner Freedman Taitelman + Cooley, LLP 1801 Century Park West, 5th Floor Los Angeles, CA 90067 310-201-0005	Nathan is a party. She has percipient knowledge as to facts and events alleged in the pleadings, including her and Wayfarer's damages.
Jennifer Abel c/o Bryan J. Freedman, Esq. Liner Freedman Taitelman + Cooley, LLP 1801 Century Park West, 5th Floor Los Angeles, CA 90067 310-201-0005	Abel is a party and publicist to Mr. Baldoni. She has percipient knowledge as to facts and events alleged in the pleadings, including her and Wayfarer's damages.
Ashmi Elizabeth Dang c/o Bryan J. Freedman, Esq. Liner Freedman Taitelman + Cooley, LLP 1801 Century Park West, 5th Floor Los Angeles, CA 90067 310-201-0005	Dang is an employee and the Head of Marketing of Wayfarer Studios. She has percipient knowledge as to facts and events alleged in the pleadings.

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Mitz Toskovic c/o Bryan J. Freedman, Esq. Liner Freedman Taitelman + Cooley, LLP 1801 Century Park West, 5th Floor Los Angeles, CA 90067 310-201-0005	Toskovic is an employee of party Wayfarer Studios. She has percipient knowledge as to facts and events alleged in the pleadings.
Imene Meziane c/o Bryan J. Freedman, Esq. Liner Freedman Taitelman + Cooley, LLP 1801 Century Park West, 5th Floor Los Angeles, CA 90067 310-201-0005	Meziane is General Counsel at Wayfarer Studios and has percipient knowledge of facts and events alleged in the pleadings.
Blake Lively c/o Michael J. Gottlieb, Kristin E. Bender, Meryl C. Governski Willkie Farr & Gallagher, LLP 1875 K Street NW Washington, DC 20006 (202) 303-1000	Lively is a party and co-star of Mr. Baldoni in <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Ryan Reynolds c/o Michael J. Gottlieb, Kristin E. Bender, Meryl C. Governski Willkie Farr & Gallagher, LLP 1875 K Street NW Washington, DC 20006 (202) 303-1000	Reynolds is a party and husband to Ms. Lively. He has percipient knowledge as to facts and events alleged in the pleadings.
Person most knowledgeable of Vision PR, Inc. c/o Sigrid S. McCawley, Lindsey Ruff, Andrew Villacastin Boies Schiller Flexner LLP 55 Hudson Yards New York, New York 10001 (212) 446-2300	Vision PR, Inc. is a party and thus has knowledge as to facts and events alleged in the pleadings.
Leslie Sloane c/o Sigrid S. McCawley, Lindsey Ruff, Andrew Villacastin Boies Schiller Flexner LLP 55 Hudson Yards New York, New York 10001 (212) 446-2300	Leslie Sloane is a party and publicist to Ms. Lively. She has percipient knowledge as to facts and events alleged in the pleadings.

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Stephanie Jones c/o Kristin Tahler, Nicholas Inns, Maaren Alia Shah Quinn Emanuel Urquhart & Sullivan, LLP 295 5th Avenue, 9th Floor New York, New York 10016 (212) 849-7000	Stephanie Jones is a party and former publicist to Wayfarer Studios and Mr. Baldoni. She has percipient knowledge as to the facts and events alleged in the pleadings.
Person most knowledgeable of Jonesworks, LLC c/o Kristin Tahler, Nicholas Inns, Maaren Alia Shah Quinn Emanuel Urquhart & Sullivan, LLP 295 5th Avenue, 9th Floor New York, New York 10016 (212) 849-7000	Jonesworks, LLC is a party and the former public relations firm of Wayfarer Studios and Mr. Baldoni and thus has percipient knowledge as to facts and events alleged in the pleadings.
Person most knowledgeable of The New York Times Company c/o Katherine Mary Bolger Davis Wright Tremaine LLP 1251 Avenue of the Americas New York, New York 10020 (212) 489-4068	The New York Times Company is a party and thus has knowledge as to facts and events alleged in the pleadings.
Megan Twohey c/o Katherine Mary Bolger Davis Wright Tremaine LLP 1251 Avenue of the Americas New York, New York 10020 (212) 489-4068	Twohey is a reporter at the New York Times and has percipient knowledge as to facts and events alleged in the pleadings.
Mike McIntire c/o Katherine Mary Bolger Davis Wright Tremaine LLP 1251 Avenue of the Americas New York, New York 10020 (212) 489-4068	McIntire is a reporter at the New York Times and has percipient knowledge as to facts and events alleged in the pleadings.
Julie Tate c/o Katherine Mary Bolger Davis Wright Tremaine LLP 1251 Avenue of the Americas New York, New York 10020 (212) 489-4068	Tate is a reporter at the New York Times and has percipient knowledge as to facts and events alleged in the pleadings.
Danielle Rhoades Ha c/o Katherine Mary Bolger Davis Wright Tremaine LLP 1251 Avenue of the Americas New York, New York 10020 (212) 489-4068	Ha is a Senior Vice President, External Communications at The New York Times and has percipient knowledge as to facts and events alleged in the pleadings.

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Jed Wallace c/o Charles L. Babcock Jackson Walker LLP 1401 McKinney St., Suite 1900 Houston, Texas 77010 cbabcock@jw.com	Wallace has percipient knowledge as to facts and events alleged in the pleadings.
Person most knowledge of Street Relations Inc. c/o Charles L. Babcock Jackson Walker LLP 1401 McKinney St., Suite 1900 Houston, Texas 77010 cbabcock@jw.com	Street Relations Inc. has percipient knowledge as to facts and events alleged in the pleadings.
Alex Saks [REDACTED] [REDACTED]	Saks was a producer of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Mariela Villa Saks Picture Company 1542 Torero Dr Oxnard, CA 93030-6199 mv@sakspicturecompany.com (805) 448-6039	Villa was an associate producer of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Andrea Giannetti c/o Sony Pictures Entertainment [REDACTED]	Giannetti is an Executive of Sony Pictures Entertainment and was heavily involved in the production of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Kimberly Wire Sony Pictures Entertainment [REDACTED]	Wire is Vice President, Global Publicity at Sony and has percipient knowledge as to facts and events alleged in the pleadings.
Todd Black [REDACTED] [REDACTED]	Black was an executive producer of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Tera Hanks Wayfarer Studios [REDACTED]	Hanks is President of Wayfarer Studios and was involved in the production of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.

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Jenny Slate REDACTED	Slate was a cast member in <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Brandon Feakins (professionally known as Brandon Sklenar) REDACTED	Feakins was a cast member in <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Hasan Minhaj REDACTED	Minhaj was a cast member in <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Kevin McKidd REDACTED	McKidd was a cast member in <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Amy Morton REDACTED	Morton was a cast member in <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Alex Neustaedter REDACTED	Neustaedter was a cast member in <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Isabela Ferrer REDACTED	Ferrer was a cast member in <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Robyn Lively REDACTED	Lively is the sister of Ms. Blake Lively and cast member in <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Adam Mondschein REDACTED	Mondschein was a cast member in <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Tina Haveles REDACTED	Haveles was an assistant to Ms. Lively. She has percipient knowledge as to facts and events alleged in the pleadings.

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Vivian Baker REDACTED	Baker was a makeup artist to Ms. Lively. She has percipient knowledge as to facts and events alleged in the pleadings.
Anne Carroll REDACTED	Carroll was a hair stylist to Ms. Lively. She has percipient knowledge as to facts and events alleged in the pleadings.
Don Saladino	Saladino was Ms. Lively's personal trainer. He has percipient knowledge as to facts and events alleged in the pleadings.
Matt Ulawski REDACTED	Ulawski was a personal trainer to Mr. Baldoni. He has percipient knowledge as to facts and events alleged in the pleadings.
AJ Marbory REDACTED	Marbory was an assistant to Mr. Baldoni and has percipient knowledge as to facts and events alleged in the pleadings.
Dion Suleman REDACTED	Suleman was an assistant to Mr. Baldoni and has percipient knowledge as to facts and events alleged in the pleadings.
Danny Greenberg William Morris Endeavor REDACTED	Greenberg was Mr. Baldoni's talent agent. He has percipient knowledge as to facts and events alleged in the pleadings.
Ariel Zev Emanuel William Morris Endeavor	Emanuel is the CEO of William Morris Endeavor and has percipient knowledge as to facts and events alleged in the pleadings.
Patrick Whitesell William Morris Endeavor	Whitesell is Executive Chairman of William Morris Endeavor and has percipient knowledge as to facts and events alleged in the pleadings.
Warren Zavala William Morris Endeavor REDACTED	Zavala is Ms. Lively's and Mr. Reynolds's talent agent. He has percipient knowledge as to facts and events alleged in the pleadings.
Jason Hodes William Morris Endeavor	Hodes is a partner at William Morris Endeavor. He has percipient knowledge as to facts and events alleged in the pleadings.

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Justin Greystone REDACTED	Greystone is a manager of Ms. Lively. He has percipient knowledge as to facts and events alleged in the pleadings.
Colleen Hoover REDACTED	Hoover is the author of the novel adapted for <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Claudia Lynn	Lynn is an assistant to Ms. Hoover. She has percipient knowledge as to facts and events alleged in the pleadings.
Tarryn Fisher	Fisher has percipient knowledge as to facts and events alleged in the pleadings.
Chelsea Cary REDACTED	Cary was an Intimacy Coordinator on the crew of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Lizzy Talbot REDACTED	Talbot was an Intimacy Coordinator on the crew of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Lauren Shaw REDACTED	Shaw was a Stunt Coordinator on the crew of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Andrea Ajemian REDACTED	Ajemian was a Line Producer and Unit Production Manager on the crew of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Julie Bloom REDACTED	Bloom was an Assistant Director of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Findlay Zotter REDACTED	Zotter was an Assistant Director of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.

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Chris Surgent REDACTED	Surgent was an Assistant Director of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Cary Lee REDACTED	Lee was an Assistant Director of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Alex Finch REDACTED	Finch was an Assistant Director of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Lisa Rodgers REDACTED	Rodgers was a Post Production Supervisor on the crew of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Barry Peterson REDACTED	Peterson was a Director of Photography on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Tobias Schliessler REDACTED	Schliessler was a Director of Photography on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Oona Flaherty REDACTED	Flaherty was an editor on the crew of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Mark Perzely REDACTED	Perezly was an assistant editor on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Shane Reid	Reid was an editor on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.

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Eric Daman REDACTED	Daman was a costume designer on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Jenn O'Brien REDACTED	O'Brien was an assistant costume designer on the crew of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Holly Unterberger REDACTED	Unterberger was a Script Supervisor on the crew of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Ari Robbins REDACTED	Robbins was an "A" camera operator on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Dave Thompson REDACTED	Thompson was an "A" camera operator on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Sebastian Slayter REDACTED	Slayter was a "B" camera operator on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
George Tur REDACTED	Tur was a "B" camera operator on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Evan Walsh REDACTED	Walsh was an assistant "A" camera operator on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Shaun Malkovich REDACTED	Malkovich was an assistant "B" camera operator on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.

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Stephen Fitzgerald REDACTED	Fitzgerald was a Digital Imaging Technician on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Amanda Uribe REDACTED	Uribe was an assistant “A” camera operator on the crew of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Charlotte Skutch REDACTED	Skutch was an assistant “B” camera operator on the crew of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Lauren Pivirotto REDACTED	Pivirotto was a wardrobe supervisor on the crew of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Mike Infante REDACTED	Infante was a production sound mixer on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
James Baker REDACTED	Baker was a Boom Operator on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Tyler Killer REDACTED	Killer was a Boom Operator on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Jared Grove REDACTED	Grove was a Video Playback Operator on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Ian Prychodniez REDACTED	Prychodniez was a Video Playback Operator on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.

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Michelle Baker REDACTED	Baker was a Location Manager on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Jeff Brown REDACTED	Brown was a Location Manager on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Erin Oakley REDACTED	Oakley was a Supervisor Sound Editor on the crew of <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Stefan Sonnenfeld REDACTED	Sonnenfeld was a DI Colorist on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Brian Tyler REDACTED	Tyler was the original composer on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Rob Simonsen Agent: REDACTED	Simonsen was a composer on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Duncan Blickenstaff Agent: REDACTED	Blickenstaff was a composer on the crew of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Kevin Goetz REDACTED	Goetz worked on behalf of Screen Engine in the production of <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Shawn Levy	Levy has percipient knowledge as to facts and events alleged in the pleadings.
Bradley Cooper	Cooper has percipient knowledge as to facts and events alleged in the pleadings.

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Taylor Swift	Swift has percipient knowledge as to facts and events alleged in the pleadings.
Michael J. Gottlieb Wilkie Farr & Gallagher LLP 1875 K Street NW Washington, DC 20006-1238 (202) 303-1000 mgottlieb@wilkie.com	Gottlieb is counsel for Ms. Lively and Mr. Reynolds and has relevant information that the Wayfarer Parties may use to support their claims and defenses in this action.
Jennifer Benson REDACTED	Benson was a health coach to Mr. Baldoni. She has percipient knowledge as to facts and events alleged in the pleadings.
Josh Greenstein c/o Sony Pictures Entertainment 10202 Washington Blvd Culver City, CA 90232 REDACTED	Greenstein is the Head of Marketing of Sony Pictures Entertainment. He has percipient knowledge as to facts and events alleged in the pleadings.
Danielle Micher c/o Sony Pictures Entertainment 10202 Washington Blvd Culver City, CA 90232 REDACTED	Micher is an employee in the Marketing and Public Relations Department of Sony Pictures Entertainment. She has percipient knowledge as to facts and events alleged in the pleadings.
Gloria Haan c/o Sony Pictures Entertainment 10202 Washington Blvd Culver City, CA 90232 REDACTED	Haan is an employee in the Marketing and Public Relations Department of Sony Pictures Entertainment. She has percipient knowledge as to facts and events alleged in the pleadings.
Danni Maggin c/o Sony Pictures Entertainment 10202 Washington Blvd Culver City, CA 90232 REDACTED	Maggin was an employee in the Marketing and Public Relations Department of Sony Pictures Entertainment. She has percipient knowledge as to facts and events alleged in the pleadings.
Joe Whitmore c/o Sony Pictures Entertainment 10202 Washington Blvd Culver City, CA 90232 REDACTED	Whitmore is an employee in the Marketing Department of Sony Pictures Entertainment and has percipient knowledge as to facts and events alleged in the pleadings.
Bridgette Wright c/o Sony Pictures Entertainment 10202 Washington Blvd Culver City, CA 90232 REDACTED	Wright is Senior Vice President of Global Creative Advertising for Sony Pictures Entertainment. She has percipient knowledge as to facts and events alleged in the pleadings.

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Michael Marshall c/o Sony Pictures Entertainment	Marshall is an employee in the Business and Legal Affairs Department of Sony Pictures Entertainment. He has percipient knowledge as to facts and events alleged in the pleadings.
Lisa Zaks Markowitz c/o Sony Pictures Entertainment REDACTED	Markowitz has percipient knowledge as to facts and events alleged in the pleadings.
Jack Pan	Pan has percipient knowledge as to facts and events alleged in the pleadings.
Liz Plank	Plank has percipient knowledge as to facts and events alleged in the pleadings.
Michael Goldberg REDACTED	Goldberg has percipient knowledge as to facts and events alleged in the pleadings.
Pam McClintock REDACTED	McClintock has percipient knowledge as to facts and events alleged in the pleadings.
James Vituscka REDACTED	Vituscka is a reporter for Daily Mail. He has percipient knowledge as to facts and events alleged in the pleadings.
Rylie Long c/o Bryan J. Freedman, Esq. Liner Freedman Taitelman + Cooley, LLP 1801 Century Park West, 5th Floor Los Angeles, CA 90067 310-201-0005	Long has percipient knowledge as to facts and events alleged in the pleadings.
Breanna Koslow c/o Bryan J. Freedman, Esq. Liner Freedman Taitelman + Cooley, LLP 1801 Century Park West, 5th Floor Los Angeles, CA 90067 310-201-0005	Koslow has percipient knowledge as to facts and events alleged in the pleadings.
Matthew Hiltzik REDACTED	Hiltzik is the CEO of Hiltzik Strategies. He has percipient knowledge as to facts and events alleged in the pleadings.
Brendon Geoffrion REDACTED	Geoffrion has percipient knowledge as to facts and events alleged in the pleadings.
Charlie Neff REDACTED	Neff is a reporter for TMZ. He has percipient knowledge as to facts and events alleged in the pleadings.

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Matthew Mitchell REDACTED	Mitchell is a former Senior Vice President of Jonesworks. He has percipient knowledge as to facts and events alleged in the pleadings.
Gordon Duren REDACTED	Duren is the Chief of Staff at Jonesworks and has percipient knowledge as to facts and events alleged in the pleadings.
Tricia L. Legittino Frankfurt Kurnit Klein + Selz PC 2029 Century Park East, Suite 2500N Los Angeles, California 90067	Legittino is counsel to Jonesworks and has percipient knowledge as to facts and events alleged in the pleadings.
Raquel Harris REDACTED	Harris is a former Director for Jonesworks. She has percipient knowledge as to facts and events alleged in the pleadings.
Audrey Hixon REDACTED	Hixon is a Junior Publicist for Jonesworks. She has percipient knowledge as to facts and events alleged in the pleadings.
Matthew Gibson REDACTED	Gibson is a Director for Jonesworks. He has percipient knowledge as to facts and events alleged in the pleadings.
Ande Bowser REDACTED	Bowser is a Junior Publicist for Jonesworks. She has percipient knowledge as to facts and events alleged in the pleadings.
Lanae Brody REDACTED	Brody has percipient knowledge as to facts and events alleged in the pleadings.
Sara Nathan REDACTED	Nathan is the sister to Ms. Melissa Nathan. She has percipient knowledge as to facts and events alleged in the pleadings.
James Knobloch REDACTED	Knobloch is a former Social Media Account Manager for Jonesworks. He has percipient knowledge as to facts and events alleged in the pleadings.
Kaeleah Isaac REDACTED	Isaac is a former employee of Jonesworks. She has percipient knowledge as to facts and events alleged in the pleadings.
Madisyn Morin REDACTED	Morin has percipient knowledge as to facts and events alleged in the pleadings.
Johnny Gines REDACTED	Gines has percipient knowledge as to facts and events alleged in the pleadings.
Serena Zuniga REDACTED	Zuniga was an account coordinator for Jonesworks. She has percipient knowledge as to facts and events alleged in the pleadings.
Josephine Sanchez REDACTED	Sanchez is a former employee of Jonesworks. She has percipient knowledge as to facts and events alleged in the pleadings.

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Jaclyn Reilly REDACTED	Reilly is a former partner of Jonesworks. She has percipient knowledge as to facts and events alleged in the pleadings.
Kirsti Yess REDACTED	Yess is a former Vice President of Jonesworks. She has percipient knowledge as to facts and events alleged in the pleadings.
Emily Mara REDACTED	Mara is a former Chief of Staff of Jonesworks. She has percipient knowledge as to facts and events alleged in the pleadings.
Kirby Allison REDACTED	Allison is a former partner of Jonesworks. She has percipient knowledge as to facts and events alleged in the pleadings.
Dr. Leslie Dobson 18685 Main St., Suite 101 P.O. Box 352 Huntington Beach, CA 92648 drleslie@drlesliedobson.com (562) 509-7933	Dr. Dobson is a forensic clinical psychologist. She has relevant information that the Wayfarer Parties may use to support their claims and defenses in this action.
Jacquelyn London REDACTED	London was an editor who worked on <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Sara Graalman REDACTED	Graalman was the makeup department head on <i>It Ends With Us</i> . She has percipient knowledge as to facts and events alleged in the pleadings.
Robert Lugo REDACTED	Lugo was the hair department head on <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Sophia Travaglia REDACTED	Travaglia was an assistant to Ms. Lively and Mr. Reynolds. She has percipient knowledge as to facts and events alleged in the pleadings.
George Dewey REDACTED	Dewey was a co-founder of Maximum Effort Productions, Inc. He has percipient knowledge as to facts and events alleged in the pleadings.
Joseph Lanius Convergence Media Law 9171 Wilshire Blvd., Suite 500 Beverly Hills, CA 90210 424-269-5010	Lanius was production counsel for the film <i>It Ends With Us</i> . He has percipient knowledge as to facts and events alleged in the pleadings.
Lindsey Strasberg Sloane, Offer, Weber and Dern, LLP 10100 Santa Monica Blvd., Suite 750 Los Angeles, California 90067 lindsey@sowdllp.com (310) 248-5108	Strasberg was an attorney for Ms. Lively and has percipient knowledge as to facts and events alleged in the pleadings.

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David Weber Sloane, Offer, Weber and Dern, LLP 10100 Santa Monica Blvd., Suite 750 Los Angeles, California 90067 david@sowdllp.com (310) 248-5100	Weber was an attorney for Ms. Lively and has percipient knowledge as to facts and events alleged in the pleadings.
Carly Swift [REDACTED]	Swift was an assistant to Ms. Saks. She has percipient knowledge as to facts and events alleged in the pleadings.
Kris DiNardi [REDACTED]	DiNardi was assistant to Mr. Greenberg and has percipient knowledge as to facts and events alleged in the pleadings.
Marie Sheehy William Morris Endeavor [REDACTED]	Sheehy was head of publicity for William Morris Endeavor. She has percipient knowledge as to facts and events alleged in the pleadings.
Harvey Levin [REDACTED]	Levin is a reporter for TMZ. He has percipient knowledge as to facts and events alleged in the pleadings.
Person most knowledgeable of Sony Pictures Entertainment 10202 Washington Blvd Culver City, CA 90232	Sony was the distributor for the film <i>It Ends With Us</i> . It has percipient knowledge as to facts and events alleged in the pleadings.
Person most knowledgeable of William Morris Endeavor 9601 Wilshire Blvd. Beverly Hills, CA 90210 310-285-9000	William Morris Endeavor was Mr. Baldoni and Wayfarer's agency. It has percipient knowledge as to facts and events alleged in the pleadings.

The above disclosure is based upon information known to date, and therefore, the Wayfarer Parties reserve their right to examine witnesses in depositions and at trial beyond the scope of these disclosures. Moreover, the Wayfarer Parties reserve the right to disclose to Plaintiff/Consolidated Defendant Blake Lively and Consolidated Defendants Ryan Reynolds, Leslie Sloane, Vision PR, Inc., and The New York Times Company, and Related Plaintiffs Stephanie Jones and Jonesworks, LLC (collectively the "Lively Parties") any additional persons they may discover to have relevant information that the Wayfarer Parties may use to support their claims and defenses in this action. In addition, the Wayfarer Parties may disclose expert witnesses during discovery as set forth in any scheduling order governing this action.

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- (ii) Description by category and location of documents and electronically stored information and tangible things that may be used to support the Wayfarer Parties' claims and defenses:

The Wayfarer Parties are aware of and presently believe that they may use the following categories of documents, data compilations, or tangible things to support its claims and defenses, which are: (a) in the possession, custody, and control of the Wayfarer Parties and/or their agents; (b) in the possession, custody, and control of the Lively Parties and/or their agents; (c) in the possession, custody, and control of third parties to this litigation; and/or (d) a matter of public record. The subject matter of such documents includes, but is not limited to:

- (1) Documents relating to the pre-production and filming periods for the film *It Ends With Us*;
- (2) Communications between any third-party witness and any of the Lively Parties relating to the allegations set forth in the parties' pleadings;
- (3) Communications between any third-party witness and any of the Wayfarer Parties relating to the allegations set forth in the parties' pleadings;
- (4) Communications between and/or among any two or more of the Lively Parties relating to the allegations set forth in the parties' pleadings;
- (5) Documents relating to Blake Lively's business endeavors and damages thereto as alleged in the Lively Parties' pleadings;
- (6) Documents relating to the Wayfarer Parties' business endeavors and damages thereto as alleged in the Wayfarer Parties' pleadings;
- (7) Documents and communications relating to the "Nicepool" character in *Deadpool & Wolverine*.
- (8) Audio and video footage relating to the allegations set forth in the parties' pleadings;

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- (9) Social media posts by third parties and related comments and discussions relating to the allegations set forth in the parties' pleadings;
- (10) Communications between and/or among the Lively Parties and Stephanie Jones and/or Jonesworks relating to the purported subpoena for communications referenced in the New York Times article entitled "'We Can Bury Anyone': Inside a Hollywood Smear Machine" and in the Lively Parties' pleadings;
- (11) Communications between and/or among the Lively Parties and the New York Times relating to the allegations set forth in the parties' pleadings;
- (12) Communications between and/or among the Lively Parties and Megan Twohey, Mike McIntire, and/or Julie Tate;
- (13) Communications between and/or among the Lively Parties and WME relating to WME's representation of Baldoni, including, without limitation, the termination thereof;
- (14) Communications between and/or among the Lively Parties' legal team and third-party percipient witnesses and/or their counsel;
- (15) Communications and documents related to the employment of Jennifer Abel by Jonesworks; and
- (16) Documents relating to the allegations set forth in the parties' pleadings.

The Wayfarer Parties may also use or rely upon documents that the Lively Parties disclose in their initial disclosures and/or produce in response to any of the Wayfarer Parties' document requests pursuant to Rule 34 of the Federal Rules of Civil Procedure, as well as documents produced by non-parties in response to any party's document requests pursuant to Rule 34 and Rule 45 of the Federal Rules of Civil Procedure.

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Because discovery has not yet commenced, the Wayfarer Parties reserve the right to supplement this disclosure as additional categories of documents supporting the Wayfarer Parties' claims or defenses are identified.

(iii) Computation of each category of damages:

As a result of the Lively Parties' wrongful actions, the Wayfarer Parties have suffered damages that are estimated and believed to exceed the sum of \$400 million. The amount includes damages resulting from lost business, harm to relationships likely to lead to future economic advantage, reputational harm, and mental and emotional suffering. In addition, the Wayfarer Parties may disclose expert opinions regarding their damages during discovery as set forth in any scheduling order governing this action. The Wayfarer Parties will also seek an award of punitive damages, pre- and post-judgment, interest, attorneys' fees and costs of this action.

(iv) Insurance Policies:

The Wayfarer Parties carried industry-standard insurance policies throughout the production of the film *It Ends With Us* and are investigating whether any such policy exists that would provide coverage of the kind described in Federal Rule of Civil Procedure 26(a)(1)(A). As noted above, in accordance with Rule 26(e), the Wayfarer Parties reserve the right to amend, revise, or supplement this Initial Disclosure as this action and discovery continue.

Dated: February 18, 2025
New York, NY

Respectfully submitted,

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Dated: February 18, 2025
Los Angeles, CA

**LINER FREEDMAN TAITELMAN
+ COOLEY**

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** admitted pro hac vice*